

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BACKERTOP LICENSING LLC,
a Texas company,

Plaintiff

v.

JUSTWORKS, INC.
a Delaware company,

Defendant

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Case No. 22-cv-10142

JURY TRIAL DEMANDED

**DEFENDANT’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO ANSWER PLAINTIFF’S COMPLAINT**

Defendant Justworks, Inc. (“Defendant”), without waiving any defenses described or referred to in Rule 12 of the Federal Rules of Civil Procedure, moves to extend the time to answer, object to, move, or otherwise respond to Plaintiff Backertop Licensing LLC’s (“Plaintiff”) complaint to and including January 18, 2023. This is a 30-day extension. This motion is not made for delay, but only to permit orderly resolution. There have been no other extensions requested by Defendant as to the complaint.

Counsel for Defendant has conferred with counsel for Plaintiff, and Plaintiff is not opposed to the extension of time sought by this motion

Dated: December 21, 2022

Respectfully submitted,

By: /s/ Krishnan Padmanabhan

Krishnan Padmanabhan

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on December 21, 2022, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Krishnan Padmanabhan

Krishnan Padmanabhan